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14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
19 LITIGATION,

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS**

20 This Document Relates to:

21 *A.R. v. Uber Technologies, Inc., et al.*, No. 24-
22 cv-01827

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

23 *D.J. v. Uber Technologies, Inc., et al.*, No.
24 3:24-cv-07228

25 *A.G. v. Uber Technologies, Inc., et al.*, No.
26 3:24-cv-01915

27 *A.R. v. Uber Technologies, Inc., et al.*, No.
28 3:24-cv-07821

B.L. v. Uber Technologies, Inc., et al., No. 24-

1 cv-7940

2 *C.L. v. Uber Technologies, Inc., et al.*, No.
3 3:23-cv-04972

4 *J.E. v. Uber Technologies, Inc., et al.*, No.
5 3:24-cv-03335

6 *Jane Doe QLF 0001 v. Uber Technologies,*
7 *Inc., et al.*, No. 3:24-cv-08387-CRB

8 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
9 No. 3:23-cv-06708

10 *K.E. v. Uber Technologies, Inc., et al.*, No.
11 3:24-cv-05281-CRB

12 *Amanda Lazio v. Uber Technologies, Inc.*, No.
13 3:24-cv-08937-CRB

14 *LCHB128 v. Uber Technologies, Inc., et al.*,
15 No. 3:24-cv-7019

16 *T.L. v. Uber Technologies, Inc., et al.*, No. 23-
17 cv-9217

18 *WHB 318 v. Uber Technologies, Inc.*, No. 3:24-
19 cv-04889

20 *WHB 407 v. Uber Technologies, Inc., et al.*,
21 No. 3:24-cv-05028

22 *WHB 823 v. Uber Technologies, Inc.*, No. 3:24-
23 cv-4900

24 *WHB 1486 v. Uber Technologies, Inc., et al.*,
25 No. 3:24-cv-04803

26 *WHB 1876 v. Uber Technologies, Inc., et al.*,
27 No. 3:24-cv-05230

28 *WHB 1898 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05027

Jane Roe CL 68 v. Uber Technologies Inc., et
al., No. 3:24-cv-06669-CRB

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Before the Court is Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss ("the Motion"). Having considered the papers filed in support of and in opposition to the Motion, all arguments presented at the hearing, and other matters relevant to the determination of the Motion, the Court is of the opinion that the Motion should be **GRANTED**.

It is therefore **ORDERED** that the Court **DISMISSES** with prejudice:

1. The fraud and misrepresentation claims of *A.R.2*, *A.G.*, *B.L.*, *C.L.*, *J.E.*, *Jaylynn Dean*, and *LCHB128*;
2. The vicarious-liability claims of *WHB 318*, *WHB 823*, and *A.G.* (including respondeat superior, apparent agency, or any other theory); the ratification claims of *A.R.2*, *WHB 1898*, and *C.L.*; and the apparent agency claims of *C.L.*;
3. The product-liability claims of:
 - a. (i) *WHB 1898*; (ii) *A.R.1*; (iii) *A.R.2*, (iv) *B.L.*, (v) *Jane Doe QLF 0001*, (vi) *Jaylynn Dean*, (vii) *LCHB128*, (viii) *T.L.*, and (ix) *WHB 1876*—to the extent based on allegations about "Safe Ride Matching";
 - b. (i) *A.R.1*; (ii) *A.R.2*; (iii) *B.L.*; (iv) *C.L.*; (v) *D.J.*; (vi) *J.E.*; (vii) *Jane Doe QLF 0001*; (viii) *Jaylynn Dean*; (ix) *K.E.*; (x) *LCHB128*; (xi) *T.L.*; (xii) *WHB 318*; (xiii) *WHB 407*; (xiv) *WHB 1486*; and (xv) *WHB 1898*—to the extent based on allegations about "Gender Matching";
 - c. (i) *A.R.2*; (ii) *Jaylynn Dean*; (iii) *K.E.*; and (iv) *A.G.*—to the extent based on "App-Based Ride Recording";
 - d. Negligent design defect and breach of warranty, alleged by (i) *C.L.*; (ii) *J.E.*; (iii) *WHB 318*; (iv) *WHB 823*; (v) *WHB 1898*; and (vi) *D.J.*;
4. The *WHB 1876*, *WHB 1898*, and *WHB 407* complaints in their entirety;
5. *Jane Roe CL 68*'s unamended complaint in its entirety.

IT IS SO ORDERED.

DATED: _____

HON. CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE